

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Amendment of Parts 22, 90 and 94)	WT Docket No. 95-70
of the Commission's Rules to)	RM-8200
Permit Routine Use of Signal)	
Boosters)	

To: The Commission

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REPLY
OF
TX RX SYSTEMS, INC.
TO
OPPOSITION TO
PETITION FOR RECONSIDERATION

TX RX Systems, Inc. ("TX RX"), by its attorneys,
pursuant to Section 1.429 of the Rules and Regulations of
the Federal Communications Commission ("Commission"), hereby
respectfully submits this Reply to Opposition to its
Petition for Reconsideration in the above-styled
proceeding.1/

REPLY

1. In its Petition for Reconsideration ("Petition")
TX RX requested the Commission to fine-tune certain aspects
of its decision to amend Parts 22, 90 and 94 of the

1/ Report and Order, 61 Fed. Reg. 31051 (June 19, 1996)
[hereinafter "Order"].

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Commissions's Rules and Regulations to permit routine use of signal boosters. TX RX demonstrated that some of the provisions adopted by the Commission in its Report and Order are more restrictive than is needed to allow more reliable radio coverage without increasing the level of interference. As shown below, the Opposition filed by Geotek Communications, Inc. ("Geotek") in response to TX RX's Petition does not adequately refute any of TX RX's basic contentions.

A. Unlikely Interference from Signal Boosters Is Easily Identified and Corrected

2. Geotek asserts that "licensees who may experience interference caused by a signal booster may not be able to readily identify the source or cause of the interference." Geotek at 2. As stated in the Petition, licensees are not permitted to extend their authorized service areas with the use of signal boosters. Petition at 5. Because of this, the same methods of identifying interference in a "non-signal booster" environment apply to areas in which signal boosters are employed. That is, licensees in the near proximity of the interference are viewed as potential sources and mutual testing is used to confirm or disconfirm the cause. Further, the same conditions which make signal

boosters useful (e.g., attenuated base station signals) also attenuate signals from undesired sources, minimizing the potential for harmful interference.

3. As stated in the Petition, in the few cases of known interference, the problem has been readily resolved by reducing amplifier gain. Petition at 4. These cases could not have been promptly resolved if the source of the interference had not been readily identifiable.

B. Past Patterns of Interference in a Specialized Mobile Radio ("SMR") and Cellular Environment Are Reliable Indicators of Future Potential Interference in a Similar Environment

4. Apparently, Geotek inferred from TX RX's statement in the Petition that the industry's experience in the use of signal boosters prior to the Order was restricted to Cellular services. Geotek at 3. While signal boosters have been used for Cellular services prior to the Order, TX RX is not familiar with those systems. However, TX RX and other manufacturers have sold more than 500 signal boosters in the 806-869 MHz and 896-940 MHz (i.e., SMR) bands. It is these Class B signal boosters that are referred to in the Petition for which there are few known cases of interference. Thus, Geotek's reference to cellular services is misplaced. The

Commission should rely upon the near total absence of interference in the SMR signal booster context as evidence that Class B signal boosters do not cause harmful interference and should not be limited to confined areas.

WHEREFORE, THE PREMISES CONSIDERED, TX RX Systems, Inc. respectfully submits the foregoing Reply and urges the Federal Communications Commission to act in a manner fully consistent with the views expressed herein.

Respectfully submitted,

TX RX SYSTEMS, INC.

By:



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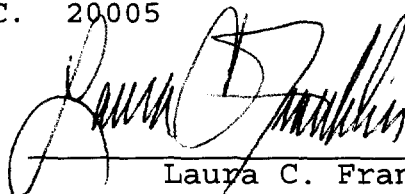
Its Attorneys

Dated: September 3, 1996

CERTIFICATE OF SERVICE

I, Laura C. Franklin, a secretary in the law firm of Keller and Heckman, do hereby certify that a copy of the foregoing Reply of TX RX Systems, Inc. to Opposition to Petition for Reconsideration has been served this 3rd day of September, 1996, by mailing U.S. first class, postage prepaid, to the following:

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A handwritten signature in black ink, appearing to read "Laura C. Franklin", is written over a horizontal line.

Laura C. Franklin